

DAVID W. SHAPIRO (CA Bar No. 219265)
SEAN PHILLIPS RODRIGUEZ (CA Bar No. 262437)
BOIES, SCHILLER & FLEXNER LLP
1999 Harrison Street, Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460
Email: dshapiro@bsflp.com
srodriguez@bsflp.com

Attorneys for Defendant
CHRISTINE D. REYES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

The parties hereby jointly request that the Court reschedule the Status Conference currently set for August 26, 2010 at 2:00 p.m. to September 2, 2010 at 2:00 p.m.

1. This case is currently set for a status conference on August 26, 2010.
2. There are also currently pending motions to quash three subpoenas served on the business of Joann Blessing-Moore and its accountants, which are set for September 2, 2010.
3. Counsel for the government and for the two defendants have agreed that, if convenient for the Court, the status conference should take place on the same date as the argument on the motions to quash.

1 The parties further stipulate and jointly request that time be excluded from the
2 Speedy Trial Act calculations from Thursday, August 26, 2010 through Thursday,
3 September 2, 2010 for effective preparation of counsel, including among other reasons
4 the need to resolve the motions regarding outstanding subpoenas and the review of a
5 large quantity of evidence. The parties agree that the ends of justice served by granting
6 such a continuance outweigh the best interests of the public and the defendants in a
7 speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

8
9 IT IS SO STIPULATED.

10
11 DATED: August 13, 2010

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
/s/
DAVID W. SHAPIRO
Attorney for Christine D. Reyes

DATE: August 13, 2010

/s/
LOREN STEWART
Attorney for Maria Virginia Reyes

DATE: August 13, 2010

/s/
THOMAS MOORE
Assistant United States Attorney

1 **[PROPOSED] ORDER**
23 For good cause shown, the status conference now scheduled for Thursday, August
4 26, 2010 is vacated. The matter shall be added to the Court's calendar on Thursday,
5 September 2, 2010 at 2:00 p.m.6 In addition, for the reasons stated above, the Court finds that an exclusion of time
7 from August 26, 2010 through September 2, 2010 is warranted and that the ends of
8 justice served by the continuance outweigh the best interests of the public and the
9 defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A). The failure to grant the
10 requested continuance would deny defense counsel the reasonable time necessary for
11 effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. §
12 3161(h)(7)(B)(iv).

13 IT IS SO ORDERED.

14 DATED: 8/25/2010